

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

AMERICAN ALLIANCE FOR
EQUAL RIGHTS,

Plaintiff,

v.

FOUNDERS FIRST COMMUNITY
DEVELOPMENT CORPORATION,

Defendant.

No. 4:24-cv-327-O

STIPULATION OF SETTLEMENT

WHEREAS Plaintiff American Alliance for Equal Rights (the Alliance) filed this suit under 42 U.S.C. §1981 in the United States District Court for the Northern District of Texas against Defendant Founders First Community Development Corporation (Founders) over its Texas Job Creators Grant Program;

WHEREAS, following a Notice of Accepted Rule 68 Offer of Judgment, the Court entered final judgment against Founders, ordering that Founders “is prohibited from either (1) considering race in awarding the Texas grant and collecting data about any applicant’s race until after selecting and announcing the Texas Grant winners, or (2) administering the Texas grant program at all”;

WHEREAS the Alliance is entitled to seek attorneys’ fees, costs, and litigation expenses under Federal Rule of Civil Procedure 54(d), 28 U.S.C. §1920, and 42 U.S.C. §1988;

IT IS HEREBY STIPULATED AND AGREED as follows:

1. Founders shall pay the Alliance \$125,000.00 (the Settlement Amount) in biannual installments.

2. The Alliance agrees to accept the full Settlement Amount as full and complete satisfaction of the Alliance's claims for attorneys' fees, costs, and litigation expenses.

3. Founders shall pay a \$50,000.00 installment of the Settlement Amount to the Alliance before the end of calendar year 2024. Founders shall subsequently pay \$25,000.00 installments of the Settlement Amount in six-month intervals. Each \$25,000.00 installment shall be paid no later than six months after payment of the prior installment.

Dated: October 14, 2024

/s/ Gregg J. Costa

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Dated: October 16, 2024

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